

FILED

Case 1:08-cv-00756

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JUDGE GETTLEMAN**FEBRUARY 4, 2008**MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT**FILED****IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

2008 JUL 13 AM 9:18

STEPHEN R. LUDWIG, CLERK
U.S. DISTRICT COURT
FOR THE NORTHERN DISTRICT
OF INDIANA**SHARON A. GIANCOLA,**
Plaintiff,**vs.****THOMAS M. REYNOLDS,**
Defendant.)
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)**CIVIL NO.****2:07CV231 RL****COMPLAINT**

Come now the Plaintiff, Sharon A. Giancola, by counsel, Robert L. Taylor, and for her cause of action, states as follows:

1. That the Plaintiff is a citizen and resident of the State of Indiana. That the Defendant is a citizen and resident of the State of Illinois. That the amount in controversy, exclusive of interest and costs, exceeds Seventy-Five Thousand (\$75,000.00) Dollars. That this Court has jurisdiction pursuant to 28 U.S.C. Section 1332.

2. That on or about July 15, 2005, at approximately 4:30 p.m., the Plaintiff, Sharon A. Giancola was traveling south bound on Wentworth Avenue, at or near the intersection of Wentworth Avenue and Washington Street in Lansing, Cook County, Illinois.

3. That at the same time, on or about July 15, 2005, at approximately 4:30 p.m., the Defendant was operating a motor vehicle west bound on Washington Street at or near the intersection of Wentworth Avenue and Washington Street, Lansing, Cook County, Illinois.

4. That the Defendant failed to stop his vehicle for the traffic control device causing his vehicle to collide with the Plaintiff's vehicle.


5. That the Defendant drove his vehicle in a careless, reckless, and negligent manner, and committed one or more of the following acts of negligence:

- (a) He negligently failed to keep his vehicle under proper control;
- (b) He negligently failed to keep a proper lookout;
- (c) He negligently failed to yield the right of way;
- (d) He negligently failed to obey a traffic control device;
- (e) He operated his vehicle at an unsafe speed;
- (f) He negligently operated and maintained his motor vehicle;
- (g) He negligently failed to stop his vehicle, when he could see that danger to the Plaintiff, was imminent.

6. That as a direct and proximate result of one or more of the Defendant's acts of negligence and negligence per se, the Plaintiff, Sharon A. Giancola, was injured, the effects of which maybe permanent and lasting, incurred pain and suffering, and incurred hospital and medical expenses.

WHEREFORE, the Plaintiff demands judgment against the Defendant as follows:

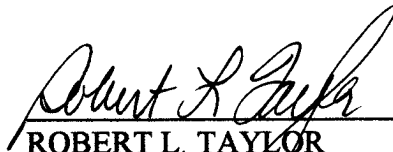
- 1. For reasonable compensatory damages in the amount of One Hundred Fifty Thousand Dollars (\$150,000.00).
- 2. For costs, interest, and the expenses of this action, and for all other just and proper relief.



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(219) 972-6000
Attorney for Plaintiff

DEMAND FOR TRIAL BY JURY

Come now the Plaintiffs, by counsel, and pursuant to the Federal Rules of Trial Procedure, demand Trial by Jury, as to all the issues herein.



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